

Remarks

The Examiner's comments in the Office Action mailed October 17, 2008 have been carefully considered. Claims 1-20 remain pending in the application. Editorial revisions have been made to claim 1. Support for these amendments can be found throughout the specification and figures. No new matter has been added.

Reexamination and allowance of the pending claims are respectfully requested.

Claim Rejections

Claims 1-3, 7-11, and 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,591,225 to Squitieri (hereinafter "Squitieri") in view of DE 9400303 (hereinafter "the German reference"). Applicant respectfully traverses the rejection.

Claim 1 recites, in part, an integral housing extending from a first end to a second end. At least one insulation-displacement terminal contact is arranged at the first end of the housing. At least one contact pin is arranged at the second end of the housing. The longitudinal axes of the insulation-displacement terminal contacts lie parallel to the surface of the printed circuit board when the conductor connection module is in the installed state on the printed circuit board.

The combination of Squitieri and the German reference fails to disclose or suggest at least one insulation-displacement terminal contact, whose longitudinal axis lies parallel to a surface of the printed circuit board, arranged at a first end of an integral housing and at least one contact pin arranged at a second end of the integral housing. Rather, both references disclose plug and receptacle-type connection systems.

In particular, Squitieri pertains to plug and receptacle connector assemblies including a receptacle assembly 20 and a plug assembly 30. The plug assembly 30 includes terminals 120 having insulation-displacement contact portions. The receptacle assembly 20 includes an array of tuning fork-like receptacle terminals 60, which slidingly receive plug terminals 120 when the connector assemblies 20, 30 are mated.

The German reference discloses a two-piece configuration for a connector module. Figures 4-5 of the German reference show an upper part 1 of the connector module and Figures 6-8 of the German reference show a lower part 2 of the connector module. Figures 1-3 of the German reference show how the upper part 1 can fit together with the lower part 2 to form a connector module (not labeled).

The Examiner asserts on page 5 of the Office Action that the motivation to combine the cited references is “to modify the structure contacts of the receptacle assembly 20 of Squitieri so that the receptacle is able to be connected with the wires by using insulation displacement technology.” In response to Applicant’s arguments that such modification would destroy the functionality of Squitieri, Examiner clarifies on page 4 of the Office Action that “the teaching of the DE (303) is used to modify the structure contacts of the receptacle assembly 20 of Squitieri to allow the contacts to be able to connect with the wires but is not for connection with the contacts of the plug connector.”

However, no such modification is necessary to allow the use of insulation displacement technology in Squitieri. The plug assembly 30 of Squitieri already has insulation-displacement contacts 120 that connect with the wires. The terminals 60 of the receptacle assembly 20 of Squitieri are configured to connect with the insulation-displacement contacts 120 of the plug assembly 30. Furthermore, no reason is provided in the cited references or elsewhere to modify Squitieri to eliminate the plug assembly 20. In fact, the disclosure of Squitieri is directed to improvements to *plug and receptacle* connector arrangements for interconnecting a printed circuit board with a cable.

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claim 1, even in view of the German reference. Claims 2, 3, and 7-10 depend from claim 1 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 1-3 and 7-10 are respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 11 recites, in part, an integral housing which holds contact elements including insulation-displacement terminal contacts and contact pins.

The combination of Squitieri and the German reference does not disclose or suggest an integral housing which holds contact elements including insulation-displacement terminal contacts and contact pins.

Rather, Squitieri discloses to *plug and receptacle* connector assemblies including a receptacle assembly 20 and a plug assembly 30. The German reference does not teach the

modification of Squitieri to obtain the invention of claim 1 for at least the same reasons as discussed above with respect to claim 1.

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claim 11, even in view of the German reference. Claim 16 depends from claim 11 and is allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 11 and 16 are respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claims 4-6, 12-15, and 17-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Squitieri in view of the German reference, and further in view of U.S. Patent No. 6,050,845 to Smalley, Jr. et al. (hereinafter “Smalley”) and U.S. Patent No. 6,095,854 to Sommer et al. (hereinafter “Sommer”). Applicant respectfully traverses the rejection.

Claims 4-6 depend from claim 1 and are allowable over Squitieri and the German reference for at least the same reasons as discussed above with respect to claim 1. Smalley and Sommer do not overcome the shortcomings of the German reference. Smalley and Sommer also fail to disclose or suggest at least one insulation-displacement terminal contact, whose longitudinal axis lies parallel to a surface of the printed circuit board, arranged at a first end of an integral housing and at least one contact pin arranged at a second end of the integral housing. Rather, both references disclose plug and receptacle-type connection systems.

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claims 4-6, even in view of the German reference, Smalley, and Sommer. Withdrawal of the rejection and allowance of claims 4-6 are respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claims 12-15 and 17-20 depend from claim 11 and are allowable over Squitieri and the German reference for at least the same reasons as discussed above with respect to claim 11. Smalley and Sommer do not overcome the shortcomings of the German reference. Smalley and Sommer also fail to disclose or suggest an integral housing which holds contact elements including insulation-displacement terminal contacts and contact pins.

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claims 12-15 and 17-20, even in view of the German reference, Smalley, and Sommer. Withdrawal of the rejection and allowance of claims 12-15 and 17-20 are respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Conclusion

In view of the above amendments and remarks, Applicant respectfully requests a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone Applicant's primary attorney-of record, Steven C. Bruess (Reg. No. 34,130) at (612) 336-4711.

Respectfully submitted,

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Date: Feb. 17, 2009

